

FILED**United States District Court****WESTERN DISTRICT OF TEXAS**CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature] DEPUTY**UNITED STATES OF AMERICA****V**Jovita GARCIA
Laura HERNANDEZ**CRIMINAL COMPLAINT****CASE NUMBER:** DR14-3307m-01,02

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 25, 2014 in Val Verde County, in the Western District of Texas defendant(s) did, (Track Statutory Language of Offense)

Knowingly and in reckless disregard of the fact that an alien had come to, entered or remained in the United States in violation of law, did transport and move and attempt to transport and move said illegal aliens including, Angel de Jesus ZAVALA-Hernandez and Javier LOERA-Olivarez, as well as three others and in furtherance of said violation of law did conspire and agree together and with other persons known and unknown to transport and move said aliens in furtherance of said violation of law.

in violation of Title 8 United States Code, Section(s) 1324

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
Official Title

On March 25, 2014, U.S. Border Patrol Agents (BPA) from the Comstock, Texas Station received a call regarding a Chevrolet Tahoe driving suspiciously around Seminole Canyon State Park. This was called in by the Seminole Canyon State Park Police. The Park Police Officer approached the two females in the vehicle later identified as Jovita GARCIA and Laure HERNANDEZ, who told the officer that they were looking for their family and that they were lost. The officer told the Border Patrol Agents that the vehicle was cleaned out and that the temporary license plates came out of Fort Worth, Texas.

Seminole Canyon State Park is located south of HWY 90 and has a close proximity to the United States/Mexican Border. It is also known as a load up area for undocumented aliens and narcotics. While Border Patrol Agents were responding to the State Park, another Border Patrol Agent notified the responding Border Patrol Agents over the radio that the vehicle in question was headed east on HWY 90. Border Patrol Agents followed the vehicle east on HWY 90 and then north on HWY 163. After following the vehicle north on HWY 163, Border Patrol Agents conducted a traffic stop on the vehicle in order to conduct an Immigration inspection on the occupants of the vehicle.

During the traffic stop, four subjects were found lying down in the back of the vehicle. All four subjects admitted being in the United States illegally. During a post Miranda statement, both GARCIA and HERNANDEZ admitted going to Seminole Canyon State Park in order to pick up undocumented aliens.

Continued on the attached sheet and made a part hereof: ☐ Yes ☒ No

Robert A. Garcia Jr.
Signature of Complainant

Sworn to before me and subscribed in my presence,

March 26, 2014

Date

Del Rio, Texas

City and State

Victor Roberto Garcia, U.S. Magistrate Judge

Name & Title of Judicial Officer

[Signature]
Signature of Judicial Officer